

## **REMARKS**

This Amendment responds to the Office Action mailed on June 01, 2005 and the Advisory Action mailed on August 22, 2005. Claims 1-66 have been cancelled, and new claims 67-80 have been added. It is believed that this Amendment places this case in condition for allowance.

Claims 51-66 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lee in view of Lazaridis et al. Applicants maintain that these rejections are improper for the reasons set forth in the Office Action Response filed on July 29, 2005. Nonetheless, to expedite prosecution of the instant application, the rejected claims have been cancelled and new claims 67-80 have been added.

New claims 67-80 are patentably distinct from each of the cited references, including the Lee and Lazaridis references, or any combination thereof. Among other distinctions, neither the Lee or Lazaridis references teach, suggest or motivate a local-area wireless communication system, as recited in new claim 67, that includes a plurality of local base stations in which each local base station is configured to maintain a routing cache based on communications received from other local base stations, where the routing cache identifies which of the plurality of local base stations were last in contact with mobile devices from which the communications were initiated, and where communications directed to the mobile device may be routed through a different local base station using the network address recorded in the routing cache without requiring the local base station to access the subscription server. An example of local base stations having a routing cache, as recited in claim 67, is set forth at page 12 of the written description with reference to Figure 4, as follows:

The routing cache in each local RF base station 44, 46a and 46b may include a log indicating the location of mobile devices to or from which a particular base station has recently received or routed data. Thus, if a local RF base station has in its routing cache the IP address for the local RF base station last known to be covering a destination mobile device, then a message may be sent directly to the proper local RF base station over the corporate LAN without first accessing the subscription server 48. For instance, with reference to FIG. 4, if data has recently been routed between the local RF base station 44 and the mobile device 20b through the local base station 46a, then the local RF base station 44 will know from its routing cache that the mobile device 20b is most likely still covered by

the local RF base station 46a. The, in steps 2 and 3 the direct message addressed to the mobile device 20b is routed to the local RF base station 46a over the LAN 14. If the IP address for the base station covering the mobile device 20b is not in its routing cache, however, then the local RF base station 44 obtains this data from the subscription server 48.

The ability of the local base stations to directly route messages to a mobile device in communication with another local base station using a routing cache without having to first access a subscription server to identify the location of the mobile device is an improvement over traditional wireless communication systems. For example, the wireless access points (APs) described in the cited Lee reference only maintain a record of mobile units for which the AP is the home agent (e.g., the home agent table) or mobile units that have roamed into the AP's coverage area (e.g., the foreign agent table). Lee does not disclose storing routing information for mobile units that are part of the home network of another AP. The only situation in which an AP in the Lee network would record the location of a mobile unit that is not within its coverage area is when a mobile unit from its home network roams to another network, a "care-of address" is recorded and used to forward messages. However, the "care-of address" used in the Lee network is used only for mobile units that are part of an AP's home network, not for recording the location of mobile units from other home networks.

For at least these reasons, the Applicants contend that new claims 67-80 are patentably distinct from the cited references and are in condition for allowance. The Examiner is, therefore, respectfully requested to enter this Amendment and pass this case to issue.

Respectfully submitted,

JONES DAY

Joseph M. Sauer (Reg. No. 47,919)  
Jones Day  
North Point, 901 Lakeside Avenue  
Cleveland, Ohio 44114  
(216) 586-7506